

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

JONATAN PALLESEN, <i>Plaintiff,</i>	§	
v.	§	CIVIL ACTION No. 1:25-cv-305
RATIONALWIKI FOUNDATION, INC. d/b/a RATIONALMEDIA FOUNDATION, TRENT TOULOUSE, LARRY WILL and JOHN DOES 1-3, <i>Defendants.</i>	§	JURY DEMANDED

VERIFIED COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, JONATAN PALLESEN, Ph.D., by and through undersigned Counsel, Aaron T. Cress, Esq. (LATE NIGHT LAW, LLC), and hereby respectfully complains and shows as follows.

PARTIES, JURISDICTION & VENUE

1. Plaintiff Jonatan Pallesen is a citizen of Denmark.
2. Defendant RationalWiki Foundation, Inc. d/b/a RationalMedia Foundation, is a New Mexico domestic nonprofit corporation and 501(c)(3), EIN 27-3197280, with its principal place of business located in New Mexico, at 122 Girard Ave NE Albuquerque, NM 87106.
3. Defendant Trent Toulouse is a resident of Albuquerque, New Mexico, a Board Trustee of Defendant RationalWiki Foundation, Inc., and was, at all times relevant, Operations Manager of a website published by Defendant RationalWiki Foundation, Inc.
4. Defendant Larry Will is a resident of Mount Airy, Maryland and a Board Trustee of Defendant RationalWiki Foundation, Inc., who goes by the online pseudonym “Cosmikdebris.”

5. Defendant John Doe 1 is a U.S. citizen and resident of Kansas, and a Board Trustee of Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon reasonable investigation, and who goes by the online pseudonym “DuceMoosolini.”

6. Defendant John Doe 2 is a U.S. citizen, and an editor of a website published by Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon reasonable investigation, and who goes by the online pseudonym “Plutocow.”

7. Defendant John Doe 3 is an editor of a website published by Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon reasonable investigation, and who goes by the online pseudonym “Bongolian.” Upon information and belief, this individual is a U.S. citizen.

8. The Court has personal jurisdiction over the Defendants by virtue of their continuous and systematic business contacts with New Mexico, and because Defendants’ acts, omissions, and transactions alleged in this Complaint occurred in New Mexico.

9. Plaintiff invokes the Court’s subject matter jurisdiction under 28 U.S.C. § 1332, because the matter in controversy exceeds the sum or value of \$75,000, exclusive of costs and interest, and because no Defendant is a resident of the same state as the Plaintiff.

10. Venue is proper before the Court.

GENERAL ALLEGATIONS

I. RATIONALWIKI FOUNDATION, INC. IS AN INFORMATION CONTENT PROVIDER

11. Under 47 U.S.C. § 230, an “interactive computer service” is afforded certain protections from civil liability. However, Section 230 distinguishes between an “interactive computer service,” and an “information content provider,” which does not enjoy such protections.

12. Section 230 defines an “interactive computer service” as “any information service, system, or access software provider that provides or enables computer access by multiple users to a computer server...” 47 U.S.C. 230(f)(2).

13. Section 230 defines an “information content provider” as “any person or entity that is responsible, in whole or in part, for the creation or development of information provided through the internet or any other interactive computer service.” 47 U.S.C. 230(f)(3).

14. Defendant RationalWiki Foundation, Inc. (“RWF”) is an information content provider.

15. RWF publishes, maintains and operates a website, at <https://rationalwiki.org> (the website, hereinafter referred to as, “RationalWiki”).

16. RWF was incorporated in 2011 by Defendant Toulouse, a resident of New Mexico.

17. Since 2011, Toulouse has served continuously as both a Board Trustee, and Operations Manager, of RWF.

18. The Operations Manager functions within RWF as the executive officer.

19. As Operations Manager, Toulouse has the sole ability to alter settings and create functions and extensions on the website server.

20. The website server is, and at all times relevant was, located in New Mexico.

21. The website server is, and at all times relevant was, operated from New Mexico.

22. Toulouse has operated and managed RationalWiki—the website—from New Mexico continuously, since at least 2011, until the present.

23. New Mexico is the principal geographic locus of RWF’s and RationalWiki’s operations.

24. RWF is governed by a Board of Trustees. Other than Toulouse, and an individual named David Gerard, all past and current Trustees use pseudonyms on RationalWiki.

25. Since 2011, only twenty-seven individuals have ever served as Trustees of RWF.

26. RationalWiki has over 8,000 discrete articles and millions of unique monthly visitors. Its articles tend to rank high in Google search results.

27. RationalWiki’s “Community Standards” page was created and heavily edited by Defendant Toulouse, and has been edited by Defendants Will and Does 1 and 2 within the last three years.

28. The page states, *inter alia*, that: (i) RationalWiki articles should take a “snarky” (meaning, snide or derisive) tone; that (ii) RationalWiki has a “scientific point of view,” meaning that “our articles take the side of the scientific consensus on an issue”; and that (iii) all content on RationalWiki must conform to the “RationalWiki Mission.”

29. The “RationalWiki Mission” page, in turn, states, *inter alia*, that:

The RationalWiki Mission is:

1. Analyzing and refuting pseudoscience and the anti-science movement;
2. Documenting the full range of crank ideas;
3. Explorations of authoritarianism and fundamentalism.
4. Analysis and criticism of how these subjects are handled in the media.

We also have a fifth, unofficial purpose, which is to provide people who agree with the previously-stated goals a place to just hang out and have fun with like-minded people.

RationalWiki is not a general encyclopedia; it does not require articles on every known subject. However, the wiki’s mainspace welcomes many articles that do not relate to the primary missions of RationalWiki providing that they are factually accurate and of interest to the community at large. These include articles on general science, historical events and important individuals throughout the world.

30. Various other policy pages on RationalWiki explicate and clarify this viewpoint further.

For example, each of the six underlined words in the above-quoted portion of the RationalWiki Mission denotes a hyperlink, which opens a separate page containing an article on that topic, i.e., on “pseudoscience,” “authoritarianism,” etc. These articles further define what is meant by those terms as they are used in the RationalWiki Mission statement and throughout RationalWiki.

31. RationalWiki holds its content out as scientifically authoritative, and objective truth.

32. For example, a fundraiser banner that has appeared at the top of every page on RationalWiki since late 2024 reads, in part,

Fighting pseudoscience isn't free... We are... hundreds of volunteers who document pseudoscience and crankery around the world every day... [W]e believe we play an important role in defending truth and objectivity.

33. This banner links to a "Fundraiser" page that was created by Defendant Toulouse and has been edited within the last year by Defendant Will, and that contains the same statements.

34. RationalWiki claims that anyone with access to the internet can "edit" (i.e., alter or contribute to the content of) the website, by authoring or editing the articles that appear there, in the nature of an interactive computer platform as defined under 47 U.S.C. § 230(f)(2).

35. This is not true in practice.

36. A very particular, highly ideologized, and readily identifiable left-liberal view of what is rational, what constitutes legitimate science, and what constitutes scientific consensus, pervades all of RationalWiki's articles, with virtually no variation.

37. Editors' contributions that contravene this viewpoint, or the RationalWiki Mission, are quickly removed from RationalWiki by a core of specialized editors, which includes Defendants Toulouse, Will, and Does 1-2.

38. This core of specialized editors actively, regularly, and aggressively enforces RationalWiki's Mission and viewpoint. Articles that are not "on mission" are deleted or altered, edits that are not "on mission" are quickly reverted, and editors who do not uphold the Mission are blocked from contributing.

39. This core of specialized editors includes sysops, techs, and moderators. Most editors (including techs, moderators and sysops) are anonymous, and use pseudonyms on the website.

40. Of these specialized editors, sysops are the lowest-ranking. There are approximately 1500 pseudonymous usernames listed as sysops on RationalWiki, though the true number of active individual sysops is lower than 200 individuals.

41. A page on RationalWiki titled, “Sysop guide” sets forth requirements that sysops must follow, including, “Checking edits by unknown contributors for untruth,” and “to collaborate with others to further RationalWiki’s mission.” The underlined term denotes a hyperlink to the “RationalWiki Mission” page.

42. Techs, moderators, and sysops have authority to alter, block and censor content created by rank-and-file editors, in order to enforce the “Mission.”

43. Techs and moderators have more extensive authority to block and censor than sysops and other editors do.

44. Techs and moderators are the highest-ranking editors of RationalWiki. There are only fifteen techs, seven of whom, including Defendants Will, Toulouse, and Doe 2, are current and/or past RWF Board Trustees. There are only six moderators (three of whom, including Defendant Doe 1, are current and/or past RWF Board Trustees). Defendant Doe 3 is also a moderator.

45. Extensive canvassing of the articles on RationalWiki reveals that virtually all of the articles appearing there have been edited by one or more techs, one or more moderators, and one or more past or current Board Trustees, and that Defendants Toulouse, Will, and Does 1-3 have each edited thousands of articles and regularly confer, in various open chat pages, about what content to publish, alter, or censor.

46. RationalWiki’s Mission and viewpoint of what constitutes legitimate science are so rigid, ideologized and dogmatic that, e.g., an article on the website, about the world-renown (and thoroughly mainstream) physicist and popular author Michio Kaku describes Kaku as “a crank”

who has “unorthodox views,” and compares Kaku to notorious conspiracy theorist David Icke (who has only a high school education and is famous for propounding his belief on social media that world leaders are “lizard people,” i.e., shape-shifting reptiles from another dimension.)

47. As another example of the extremism of RationalWiki’s mission, an article on the website about Steven Pinker (the world-renown linguist, popular author and senior professor of psychology at Harvard University) categorizes Pinker as a “racialism pseudoscientist.” Writing on her personal blog under the pseudonym “Pinkerite,” a longtime RationalWiki sysop named Nancy McClernan calls Professor Pinker “the media-friendly face of race pseudoscience.”

48. No particular background, knowledge, training, or credential—academic, scientific, or otherwise—is required to be an editor, sysop, tech, moderator, or Trustee of RationalWiki. The only requirements to “edit” (i.e., to create or alter content) are to adhere to RationalWiki’s Mission and uphold its point of view, to adhere to various non-ideological behavior rules and procedures for decision-making, and submit to oversight by higher ranking editors.

49. An article created by Toulouse in 2011, titled “Legal FAQ,” has appeared on RationalWiki continuously since that time. It describes RationalWiki as a “content producer.” This article was created by Toulouse and has been heavily edited by Toulouse, by current tech David Gerard, as well as by Defendant Will.

50. Individuals who are the subject of laudatory articles on RationalWiki are those whose views conform to the RationalWiki point of view. However, consistent with RationalWiki’s Mission of “refuting pseudoscience,” most articles about individuals on RationalWiki are disparaging and accuse the subjects of being cranks, fascists, anti-science or pseudoscientists.

51. When a disparaging article about an individual appears on RationalWiki, this suggests that the person who is the subject of the article is a crank, a fascist, or a pseudoscientist.

II. DEFENDANTS ARE DEFAMING PLAINTIFF

52. Plaintiff Jonatan Pallesen is a statistician who has his Ph.D. in statistical genomics (and a M.A. in molecular biology and mathematics) from Aarhus University, in Denmark. Statistical genomics is a field that applies statistical methods to analyze and interpret genomic data, to better understand the genetic basis of complex traits, diseases, and populations.

53. Dr. Pallesen has authored 33 scholarly publications since 2013, and his work has been cited by other scholars 7788 times. All of Dr. Pallesen's scholarly articles are peer-reviewed and most of them are published in Q1 scientific journals.¹ Dr. Pallesen's public Google Scholar profile shows that he has an h-index of 17 after twelve years of publishing.²

54. Plaintiff is not a public figure.

55. RationalWiki contains an article titled "Jonatan Pallesen." The article was published in May 2024 and has been edited within the last year by Defendants Will and Does 2-3. Approximately ten other anonymous users have contributed "edits" to the article under pseudonyms or IP addresses.

56. The article portrays Dr. Pallesen as a conspiracy theorist, a eugenicist, a fascist, a global warming denialist, a pseudoscientist, a Nazi, and a Holocaust denier.

57. The article is false because Dr. Pallesen is not a conspiracy theorist, a eugenicist, a fascist, a global warming denialist, a pseudoscientist, a Nazi, or a Holocaust denier.

a. The Article About Dr. Pallesen Uses Narrowly Defined Terminology

58. The terms RationalWiki uses to describe Dr. Pallesen are not mere subjective epithets.

¹ Q-score is an index of a scholarly journal's impact, with Q1 being the top 25% of journals in their domain.

² h-index is a measure of a scientist's personal impact in their field. An h-index of 20 after 20 years of publishing is considered excellent and makes a scientist competitive for tenure-track positions.

59. On the contrary, RationalWiki sets forth particularized definitions of the terms they use to describe Dr. Pallesen.

60. In the RationalWiki article about Dr. Pallesen, at the bottom of the page, a list of “categories” appears, which Dr. Pallesen purportedly belongs in. These categories include: “Conspiracy theorists,” “Eugenics supporters,” “Fascists,” “Global warming denialists,” “Racialism pseudoscientists” and “white supremacists.”

61. Each of the “categories” in this list (in the article about Dr. Pallesen) is hyperlinked to another page on RationalWiki which lists individuals who purportedly belong in that category.

62. At the top of the “Categories:Conspiracy theorists” page (which has been edited within the last three years by Defendants Will and Doe 3, and where Dr. Pallesen is listed along with Alex Jones and David Icke), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Conspiracy theorists.*” The underlined word denotes a hyperlink which links to an article titled “Conspiracy theory.” That article has been edited within the last three years by Defendants Will and Does 1-3, and defines “conspiracy theory” as,

A conspiracy is a secret plan to achieve some goal, whose members are known as conspirators. A **conspiracy theory** originally meant an idea that an event or phenomenon was the result of conspiracy. However, since the mid-1960s, it has often been used to denote ridiculous, misconceived, paranoid, unfounded, outlandish, or irrational speculative theories.

63. By categorizing Dr. Pallesen as a conspiracy theorist and defining conspiracy theory in this way, RationalWiki is stating that this definition applies to him.

64. That definition does not apply to him. Dr. Pallesen has never advocated any “ridiculous, misconceived, paranoid, unfounded, outlandish, or irrational speculative theor[y],” and there is no evidence that he has ever done so.

65. At the top of the “Categories:Fascists” page (which has been edited within the last three years by Defendants Will and Does 1-3, and where Dr. Pallesen is listed along with Adolf Hitler), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Fascism.*” The underlined word denotes a hyperlink which links to an article titled “Fascism.” That article was created within the last three years by Defendant Will, and has been edited within the last three years by Defendants Will and Does 1-3. It defines “fascism” as,

Fascism is a term applied to a fairly diverse range of historical regimes, but is generally agreed to refer to a system of far-right authoritarianism and totalitarianism characterized by its obsession with the nation and often race, severe regimentation of society, and extreme levels of political violence aimed at purifying and expanding the state.... It's rather difficult to pin down an *exact* definition of what fascism actually means.... However, fascism has some general characteristics: militaristic and often expansionist nationalism (e.g., irredentism), contempt for the democratic process, contempt for both capitalism and communism...., a belief in a natural hierarchy (e.g. caste), and a desire to subordinate individual interests to the will of the dictator. It also often demands a “cleansing” of “inferior” individuals and ethnic groups who are not seen as contributing to a unified society.

- 66. The underlined terms denote hyperlinks that link to articles which define those terms.
- 67. The linked article titled “Authoritarianism” defines that term as follows:

Authoritarianism refers to political, economic, or social systems in which power is concentrated in a central authority which acts without accountability to the people impacted by its decisions.

- 68. Dr. Pallesen has never advocated authoritarianism, including as defined by RationalWiki.
- 69. The linked article titled “Totalitarianism” defines that term as follows:

Totalitarianism is, in short, a rhetorical term deployed to indicate *really* repressive tyranny. More specifically, totalitarian political systems exercise extensive control over both private and political life while outlawing all forms of opposition.

- 70. Dr. Pallesen has never advocated totalitarianism, including as defined by RationalWiki.

71. Dr. Pallesen has also never expressed “contempt for the democratic process,” nor has he ever advocated for “severe regimentation of society,” “extreme levels of political violence aimed at purifying and expanding the state,” irredentism, or a caste system.

72. By categorizing Dr. Pallesen as a fascist, defining fascism in manner set forth in the “Fascism” article, and linking the “Fascism” article to the article about Dr. Pallesen, RationalWiki is stating that Dr. Pallesen is a fascist to whom that definition applies.

73. That definition does not apply to Dr. Pallesen.

74. At the top of the “Categories:Eugenics supporters” page (which has been edited within the last three years by Defendant Doe 2, and where Dr. Pallesen is listed along with Adolf Hitler), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Eugenics.*” The underlined word denotes a hyperlink which links to an article titled “Eugenics.” That article has been edited within the last three years by Defendants Will, and Does 1-3, and defines “eugenics” as,

the purported study of applying the principles of artificial selection and selective breeding through altering human reproduction with the goal of changing the relative frequency of traits in a human population... Most eugenicists believe that the goal of humanity is to achieve racial purity and exterminate people they deem not racially pure [through] abortion, forced sterilization, and mass murder.

75. By categorizing Dr. Pallesen as a eugenics supporter, calling him a fascist, and defining eugenics in the manner set forth in the “Eugenics” article, RationalWiki is stating that Dr. Pallesen is a eugenics supporter to whom that definition applies.

76. That definition does not apply to Dr. Pallesen.

77. Dr. Pallesen is not a eugenics supporter.

78. Dr. Pallesen has never advocated or engaged in “the... study of applying the principles of artificial selection and selective breeding through altering human reproduction with the goal of changing the relative frequency of traits in a human population.”

79. Dr. Pallesen has never advocated for “racial purity” and has never stated or even suggested that “the goal of humanity is to achieve racial purity.”

80. Dr. Pallesen has never advocated or engaged in “forced sterilization, [or] mass murder.”

81. At the top of the “Categories:Global warming denialists” page (where Dr. Pallesen is listed along with Alex Jones and Vladimir Putin), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Global warming denialists.*” The underlined word denotes a hyperlink which links to an article titled “Climate change.” That article has been edited within the last three years by Defendants Will and Does 1-3, and defines “climate change denial” as,

Global-warming denialism refers to claims... mostly funded by the fossil-fuel industry... that global warming: A) is not happening B) is not caused by humans C) is not significant enough to be a threat D) is not important E) is beneficial F) is unsolvable G) will advance the second coming of Christ...

82. By categorizing Dr. Pallesen as a “global warming denialist” and defining that term in manner set forth in the “Climate change” article, RationalWiki is stating that Dr. Pallesen is a global warming denier (or climate change denier) to whom that definition applies.

83. That definition does not apply to Dr. Pallesen.

84. Dr. Pallesen is not a global warming denier, or a climate change denier.

85. Dr. Pallesen has never advocated or engaged in climate change denial, including as defined by RationalWiki.

86. The RationalWiki article about Dr. Pallesen refers to him repeatedly as a pseudoscientist.

87. A “fundraiser” banner appears at the top of every page on RationalWiki (including the article about Dr Pallesen) which states that “Fighting pseudoscience isn’t free,” and “we... document pseudoscience and crankery around the world every day.”

88. By publishing a disparaging article about Dr. Pallesen under this banner, RationalWiki is stating that Dr. Pallesen is a pseudoscientist.

89. At the top of the “Categories:Racialist pseudoscientists” page (which has been edited within the last three years by Defendants Will and Doe 3, and where Dr. Pallesen is listed), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Racialism.*” The underlined word denotes a hyperlink which links to an article titled “Racialism.” That article has been edited within the last three years by Defendants Will and Doe 3, and defines “racialism,” as, “a set of far-right pseudoscientific ideas which hold that humanity can at all be meaningfully divided into biological categories...” and “[t]he idea that humans could be neatly divided into races.”

90. By categorizing Dr. Pallesen as a “racialist pseudoscientist” and defining “racialism” in this way, RationalWiki is stating that Dr. Pallesen is a pseudoscientist.

91. Dr. Pallesen is not a “pseudoscientist.”

92. Dr. Pallesen is a credentialled scientist with an h-index of 17, who has authored 33 scholarly publications, the majority peer-reviewed and published in Q1 journals. His work has been cited by other scholars 7788 times. Dr. Pallesen has a public Google Scholar profile which contains all of this information.

93. Defendants, on the other hand, have no known academic credentials or scientific bona fides, other than, potentially, Defendant Will (who purports on LinkedIn to have earned a B.S. in computer science after seven years at the University of Maryland) and Defendant Toulouse—

who teaches at a community college, is listed as a co-author of only five scholarly publications over his entire career, and whose work is of such low impact that he does not even have an h-index or a profile on ResearchGate or Google Scholar.

94. The RationalWiki article about Dr. Pallesen refers to him as a white nationalist.

95. An article on RationalWiki titled, “Pissed at us” lists and discusses individuals who are purportedly angry (or “pissed”) at RationalWiki. Regarding Dr. Pallesen, the article states that “Jonatan Pallesen is a Danish white nationalist.”

96. RationalWiki contains an article titled “White nationalism,” which states that white nationalists believe in a “Zionist conspiracy,” and that “Most self-described ‘white nationalist’ activists also *just happen* to take the side of Nazi Germany against the United Kingdom, the United States, and the USSR in discussions of World War II. Holocaust denialism and sympathizing with Nazis (if they don't outright support them directly) is a common thread among ‘white nationalists.’”

97. By referring to him as a “white nationalist,” RationalWiki is stating that these descriptions apply to Dr. Pallesen.

98. Those descriptions do not apply to him. Dr. Pallesen does not and has never said that he believes in a “Zionist conspiracy.” Dr. Pallesen does not and has never said that he “take[s] the side of Nazi Germany,” and he has never espoused or engaged in Holocaust denial.

99. At the top of the “Categories:White supremacists” page (which has been edited within the last year by Defendants Does 2-3, and where Dr. Pallesen is listed along with David Duke and Charles Manson) a conspicuous, highlighted note appears in bold font, which reads, “See the main article for this category, White supremacy.” The underlined word denotes a hyperlink which links to an article titled “White supremacy.” That article has been edited within the last three

years by Defendants Will and Does 1-3, and defines white supremacy as, “an ideology claiming that white people are superior to other races, and are a ‘master race.’”

100. By categorizing Dr. Pallesen as a “white supremacist” and defining the term in this way, RationalWiki is stating that this definition applies to Dr. Pallesen.

101. That definition does not apply to him. Dr. Pallesen has never said that white people are a master race, and there is no evidence that he has ever done so.

b. RationalWiki Further and Invidiously Mischaracterizes Dr. Pallesen

102. From the time it was authored in May 2024 until February 2025, the RationalWiki article about Dr. Pallesen stated in the first sentence that,

Jonatan Pallesen is a Danish far-right conspiracy theorist, white nationalist and hereditarian who promotes race realism pseudoscience and has co-authored controversial papers with eugenicists...

103. Each underlined term denoted a hyperlink that linked to an article that defined that term.

104. The statement suggested that those terms accurately described Dr. Pallesen and that the definitions in the hyperlinked articles applied to him.

105. Those definitions did not apply to Dr. Pallesen.

106. The RationalWiki article about him also states that, “Pallesen is using his X.com account to spread racist misinformation that all Pakistanis are ‘child rapists.’”

107. Dr. Pallesen has never stated that “all Pakistanis are child rapists.”

108. The article states that Dr. Pallesen “claims that... all Pakistanis are ‘inbreds.’”

109. Dr. Pallesen has never “claim[ed] that all Pakistanis are inbreds.”

110. The article states that, “[a] common theme on Pallesen’s X.com account is to claim that all Muslim men are rapists.”

111. Dr. Pallesen has never stated that “all Muslim men are rapists.”

112. The article states that “[a]bout 90% of his X.com feed consists of posting hateful comments against Islam.”

113. That statement is false and baseless.

114. The article states that, “Pallesen spends his time cherry-picking and distorting crime statistics to make racist claims...”

115. Dr. Pallesen does not and has never cherry-picked or distorted crime statistics.

116. The article states that, Dr. Pallesen “spends most of his time on X.com posting climate change denial.”

117. Dr. Pallesen has never posted climate change denial on X.com, much less “spen[t] most of his time” doing so.

118. The article states that, “Pallesen claims [that] ‘animal suffering is one of our most important issues.’ This is likely to be a case of online virtue signaling rather than a real concern for animals,” and that Dr. Pallesen “pretends to care about the welfare of the animals...”

119. These statements are false, entirely speculative, and baseless.

120. The RationalWiki article about Dr. Pallesen states that,

In November 2024, Pallesen promoted a conspiracy that he was being targeted because of his ‘stance against the current European mass immigration regime.’ [21]

121. Footnote 21 in the above-quoted passage cites an archived post from Dr. Pallesen’s X.com account, from November 2024, in which he discusses at length both the RationalWiki article about him, and an article about him that was published in the *Guardian*. Both of those articles cast aspersions on Dr. Pallesen on account of his “stance against the current European mass immigration regime.”

122. Thus, Dr. Pallesen was indeed “being targeted” with adverse publicity “because of his stance” against mass immigration, and RationalWiki’s characterization of this claim as a “conspiracy [theory]” is knowingly false.

c. Defendants Realize That Their Statements About Dr. Pallesen Are False

123. Defendants know, or have reason to know, that Dr. Pallesen is a credentialled scientist and not a “pseudoscientist.”

124. This is because an index of Dr. Pallesen’s academic publishing history and his h-index are listed on his publicly viewable Google Scholar profile, which ranks in the top five Google search results for his name. Moreover, the RationalWiki article about him discusses part of his publication history.

125. Defendants know, or have reason to know, that their characterization of Dr. Pallesen’s statements and content on X.com is inaccurate.

126. This is because the RationalWiki article about Dr. Pallesen cites dozens of archived posts from his X.com account.

127. Defendants know, or have reason to know, that numerous specific statements they have published about Dr. Pallesen on RationalWiki are untrue.

128. This is because the “Pissed at us” article on RationalWiki, where it discusses Dr. Palessen, quotes from a blog post authored by him and published in November 2024, where Dr. Pallesen discusses the RationalWiki article about himself, quotes numerous specific statements made in the article, and discusses why they are false.

129. In that blog post, Dr. Pallesen states that,

I do not think that only Whites should live in Europe. RationalWiki’s page about white nationalists says that they tend to believe in a “Zionist conspiracy,” which I do not. It also says that *“Most self-described ‘white nationalist’ activists also just happen to take the*

side of Nazi Germany against the United Kingdom and the United States" which is one of the most ridiculous things I have ever read. No, I do not take the side of Nazi Germany.

130. The "Pissed at us" article directly quotes this passage, verbatim, in its entirety, yet the RationalWiki article about Dr. Pallesen has continued to refer to him as a "white nationalist" while defining that term the way that Dr. Pallesen's blog post describes, as just quoted.

131. In the aforesaid blog post, Dr. Pallesen further states that,

If I go to the Rational Wiki article about [eugenics], it says that "*Most eugenicists believe that the goal of humanity is to achieve racial purity and exterminate people they deem not racially pure.*" This is the new most ridiculous thing I have ever read. No, I do not believe that this is the goal of humanity, and I do not think that people should be exterminated.

132. Despite Defendants knowing of this blog post where Dr. Pallesen addresses their accusations and clarifies his views, the RationalWiki article continues to categorize Dr. Pallesen as a "eugenics supporter."

133. The RationalWiki article about Dr. Pallesen falsely states that he "promotes discredited race realism." In a separate article titled "Racialism" that is linked from the article about Dr. Pallesen, RationalWiki defines "race realism" as "[t]he idea that humans could be neatly divided into races." In the aforesaid blog post, Dr. Pallesen addresses this statement by RationalWiki, writing that,

I believe race is a meaningful concept, and there are differences in various traits on average between races. I also believe that a lot of genetic variation is clinal, and that not every person can be clearly categorized as one race or another.

134. Thus, Dr. Pallesen has made clear that he does not believe "that humans could be neatly divided into races."

135. Despite Defendants knowing of this blog post, the RationalWiki article about Dr. Pallesen continues to state that he "promotes race realism."

136. Footnote 21 of the RationalWiki article about Dr. Pallesen cites an archived post from his X.com account, from November 2024. In that post, Dr. Pallesen states that,

If you search for my name on Google, the first hit is Rational Wiki, a type of woke smear site. The entry there claims that I hold racist opinions and am a white nationalist, among other accusations. If I click on the article's link for white nationalism, it says that most white nationalists support Nazi Germany over the allies in World War II. I obviously do not support Nazi Germany. But now this association is among the first things people will find if they google my name. These articles in The Guardian and on Google have real impact on my life and career. People have directly informed me that they would not collaborate on projects they were otherwise interested in, due to their disapproval of the claims they read about me. Additionally, I have learned from a former colleague in genetics that there are concerns from other academics regarding shared authorship on older papers, due to the claims about me from the articles. This naturally implies that these individuals are not interested in future collaborations with me, and acquiring academic funding is likely to be challenging. Consequently, pursuing the career for which I earned my PhD has become unfeasible to me.

137. By including a footnote (in their article about Dr. Pallesen) that links to an archived version of this post on X.com, Defendants demonstrate that they are well aware of the damage they are causing Dr. Pallesen.

III. DR. PALLESEN IS BEING DAMAGED

138. The “Jonatan Pallesen” article was published on RationalWiki in May 2024, and has remained published and viewable on the website since that time.

139. Since mid-2024, the article has continuously ranked at the top of the first page of Google search results for Dr. Pallesen’s name. In Denmark, the article is the very first result.

140. Defendants are aware that RationalWiki’s “page rank” on Google is abnormally high, and that, as a result, when they publish disparaging articles like the one about Dr. Pallesen, this is likely to cause considerable reputational damage to the subjects and targets of that content, and is likely to discourage third parties from dealing with the individuals targeted.

141. Because the article ranks on the first page of Google search results for Dr. Pallesen's name, Dr. Pallesen's colleagues and potential business associates see the article when they search his name on Google.

142. Due to RationalWiki's claims of scientific objectivity, its resemblance to Wikipedia, and its high rank in Google search results, the website appears authoritative, thus discouraging others from dealing with Dr. Pallesen.

143. Its high rank in Google search results, alone, is enough to raise reputational concerns serious enough to discourage others from dealing with Dr. Pallesen.

144. These factors, coupled with the website's characterization of Dr. Pallesen as a conspiracy theorist, a eugenics supporter, a fascist, a global warming denialist, a pseudoscientist (alongside highly particularized and deeply stigmatizing definitions of those terms), a Nazi, and a Holocaust denier, are humiliating and stressful to Dr. Pallesen, and discourage others from dealing with him.

145. The RationalWiki article about Dr. Pallesen has been seen by numerous colleagues and potential business associates and caused them to refrain from dealing with Dr. Pallesen, to the extent that since mid-2024, Dr. Pallesen faces significant difficulty in seeking employment or grants in his scientific field.

146. As a result of exposure to the RationalWiki article about him, numerous colleagues of Dr. Pallesen have expressed their unwillingness to collaborate with him.

147. The RationalWiki article about Dr. Pallesen and its prominent ranking in Google search results continue to stigmatize him, prevent others from dealing with him, and emotionally traumatize Dr. Pallesen.

ENUMERATED CAUSES OF ACTION

WHEREFORE the Plaintiff, JONATAN PALLESEN, Ph.D., as a direct and proximate result of Defendants' misconduct, has been damaged, and hereby pleads the following causes of action against Defendants, whom he seeks to hold liable:

COUNT I
Defamation
Against All Defendants

148. Plaintiff incorporates by reference all preceding paragraphs.
149. Defendants published false statements of fact about Plaintiff to third parties.
150. Defendants published aforesaid false statements without privilege.
151. Aforesaid third parties understood the false statements to have defamatory meaning.
152. Defendants published the false statements while knowing they are false.
153. Defendants published the false statements with reckless disregard for the truth.
154. Defendants' defamation is wanton and willful.
155. Defendants published the false statements negligently.
156. As a direct and proximate result of Defendants' defamation, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT II
Invasion of Privacy: False Light
Against All Defendants

157. Plaintiff incorporates by reference all preceding paragraphs.

158. Defendants published statements about Plaintiff in public fora, attributing false characteristics to Plaintiff.

159. The characteristics which Defendants falsely attributed to Plaintiff are highly offensive to a reasonable person.

160. Defendants intentionally portrayed Plaintiff in a false light before the community.

161. Defendants recklessly portrayed Plaintiff in a false light before the community.

162. Defendants portrayed Plaintiff in a false light without privilege.

163. Defendants' false light invasion of privacy is wanton and willful.

164. As a result of Defendants' false light invasion of privacy, Plaintiff has suffered humiliation, mental anguish, and suffering.

165. As a direct and proximate result of Defendants' false light invasion of privacy, the Plaintiff has been damaged, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT III
Conspiracy
Against All Defendants

166. Plaintiff incorporates by reference all preceding paragraphs.

167. Defendants intentionally agreed to defame Plaintiff

168. Defendants intentionally agreed to violate Plaintiff's privacy.

169. Defendants agreed to defame Plaintiff with knowledge of unlawfulness.

170. Defendants agreed to violate Plaintiff's privacy with knowledge of unlawfulness.

171. One or more Defendants acted overtly in furtherance of each of aforesaid agreements.

172. As a direct and proximate result of Defendants' conspiracy, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT IV
Prima Facie Tort
Against All Defendants

173. Plaintiff incorporates by reference all preceding paragraphs.

174. Defendants jointly and severally committed intentional acts directed at Plaintiff.

175. Defendants committed aforesaid acts with intent to injure the Plaintiff.

176. Defendants committed aforesaid acts without justification.

177. Aforesaid acts were wanton and willful.

178. Aforesaid intentional acts were otherwise lawful.

179. Plaintiff was damaged as a result of aforesaid acts.

180. As a direct and proximate result of Defendants' prima facie tort, the Plaintiff has been damaged and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

JURY DEMAND

Plaintiff demands a trial by jury of all issues so triable.

PRAYER FOR RELIEF

WHEREFORE the Plaintiff, JONATAN PALLESEN, Ph.D., hereby respectfully prays the Court's relief, as follows:

- I. Compensatory damages in the amount to be proven at trial.
- II. Punitive damages.
- III. Pre- and post-judgment interest.
- IV. Attorney fees and all costs of bringing this action.
- V. Such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

LATE NIGHT LAW, LLC

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